

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
ENTERTAINMENT MEDIA TRUST,	)	MB Docket No. 19-156
DENNIS J. WATKINS, TRUSTEE	)	
	)	
Applications to Renew License:	)	
	)	
KFTK(AM) (formerly WQQX(AM)), East St.	)	Facility ID No. 72815
Louis, Illinois	)	File No: BR-20120709ACP
	)	
WQQW(AM), Highland, Illinois	)	Facility ID No. 90598
	)	File No. BR-20120709AC0
	)	
KZQZ(AM), St. Louis, Missouri	)	Facility ID No. 72391
	)	File No. BR-20120921AAW
	)	
KQQZ(AM), DeSoto, Missouri	)	Facility ID No. 5281
	)	File No. BR-20120921ABA
	)	
Application for Consent to Assignment of	)	
Licenses:	)	
	)	
KFTK(AM) (formerly WQQX(AM)), East St.	)	Facility ID No. 72815
Louis, Illinois	)	File No: BAL-20160919ADH
	)	
WQQW(AM), Highland, Illinois	)	Facility ID No. 90598
	)	File No. BAL-20160919ADI
	)	
KZQZ(AM), St. Louis, Missouri	)	Facility ID No. 72391
	)	File No. BAL-20160919ADJ
	)	
KQQZ(AM), DeSoto, Missouri	)	Facility ID No. 5281
	)	File No. BAL-0160919ADK
	)	
Application for Permit to Construct New Station:	)	
	)	
W275CS, Highland, Illinois	)	Facility ID No. 200438
	)	File Nos. BNPFT-
	)	20170726AEF and BNPFT-
	)	20180314AAO
	)	

**MOTION FOR EXTENSION OF TIME**

Applicant, Entertainment Media Trust, Dennis J. Watkins, Trustee (“EMT”), by

and through counsel, hereby requests, pursuant to 47 CFR §1.205, an extension of time to respond to the Enforcement Bureau's First Request for Production of Documents (the "Document Request") served upon EMT on August 20, 2019. In support of this request, the following is stated:

1. Pursuant to 47 CFR §1.325, the response date to the Document Request is August 30, 2019.
2. EMT requires a minimum of two additional weeks to respond to the Bureau's Document Request.
3. This request is not made for the purpose of delay but is made in light of the following circumstances:
  - a. Since August 15, 2019, EMT has been engaged with the Bureau in discussions regarding potential avenues to more quickly resolve this matter. As those discussions are ongoing, with the latest having occurred on August 28, 2019, EMT respectfully requests that the additional time requested is warranted to allow pursuit of options that may serve the public interest and minimize the burdens on the Commission and the parties of a full hearing process.
  - b. EMT has scheduled a meeting for Tuesday, September 3, 2019, with potential counsel regarding a possible bankruptcy filing. Additional time is therefore warranted in light of the fact that a bankruptcy filing by EMT would result in a stay of this proceeding.
  - c. Paul Lauber, preparer of the 2012 Restated Trust Instrument and the EMT #2 documents, is out of the country until Monday, September 2,

2019, and EMT is therefore unable to fully respond to document requests relating to Mr. Lauber.

EMT submits that the relief requested is reasonable and does not prejudice any party. Accordingly, EMT hereby requests that the deadline for its response to the Document Request be extended until and including September 13, 2019.

RESPECTFULLY SUBMITTED,

\_\_\_\_\_/s/\_\_\_\_\_  
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## **CERTIFICATE OF SERVICE**

I, Seth Williams, hereby certify that on this 30<sup>th</sup> day of August, 2019, a copy of the foregoing Motion for Extension of Time was served by email on the following:

Jeffrey Gee, Esq.  
Chief, Investigations & Hearings Division  
Enforcement Bureau  
Federal Communications Commission  
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Courtesy copies of the foregoing were also provided by email to the following:

The Honorable Jane Hinkley-Halprin  
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/s/ Seth L. Williams \_\_\_\_\_